



January 26, 2006

Filed Electronically

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Room TW-B204
Washington, DC 20554

Re: WT Docket No. 05-265

Dear Ms. Dortch:

Alaska Native Broadband 1 License, LLC ("ANB 1 License") hereby submits its reply comments with respect to matters raised in the Commission's Notice of Proposed Rulemaking in the referenced proceeding.

ANB 1 License is a new entrant to the market for the provision of commercial mobile radio services ("CMRS"). ANB 1 License was the winning bidder for nine broadband personal communications service ("PCS") licenses offered by the Commission in Auction 58. Those licenses were granted to ANB 1 License on September 6, 2005, and ANB 1 License is in the process of working to launch service in those markets. ANB 1 License is indirectly owned in part and controlled by Arctic Slope Regional Corporation, which is an Alaska Native Regional Corporation organized pursuant to the Alaska Native Claims Settlement Act, 43 U.S.C. § 1601 *et seq.* Arctic Slope Regional Corporation is owned by approximately 9,500 Alaska Native shareholders who are recognized to be socially and economically disadvantaged for all purposes of federal law. 43 U.S.C. § 1626(e). Leap Wireless International, Inc., which filed comments in this proceeding, is an indirect non-controlling investor in ANB 1 License.

As ANB 1 License enters the CMRS market, it is critical that it have access to reliable and nondiscriminatory roaming arrangements with other CMRS providers. Currently, ANB 1 License is licensed to provide broadband PCS in just nine basic trading areas. This means that ANB 1 License subscribers will often rely on roaming arrangements from other carriers even when the subscribers remain in their home areas. If the prices for roaming arrangements are too high, or if the roaming arrangements do not exist at all or consist only of cumbersome, manual arrangements, ANB 1 License's service will surely be less attractive to potential customers than the services of others.

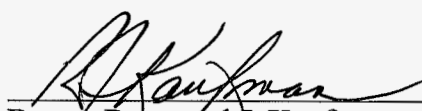
For a new entrant such as ANB 1 License, access to these arrangements is central to its ability successfully to create a realistic competitive alternative to existing carriers.

In the absence of a Commission requirement that CMRS providers provide reliable (*i.e.*, automatic) and nondiscriminatory roaming arrangements, existing providers will have little incentive to deal reasonably with ANB 1 License. These existing providers can use their substantial dominance to demand unfair roaming terms from the likes of ANB 1 License with little concern for any consequences. The most immediate losers in such a case will be the ANB 1 License subscribers. These individuals will be forced to pay unnecessarily high rates or to furnish credit cards, which many may not have, when outside the ANB 1 License coverage area. For those who cannot afford such high rates or do not have sufficient credit to satisfy the demands of the other CMRS provider, alternatives include discontinuing the use of their wireless telephones when roaming or to drop ANB 1 License service altogether. The first alternative cannot be in the public interest, particularly when wireless telephones are so important to matters of personal and public safety. The second alternative cannot be what the Commission has in mind when it works to promote the dissemination of CMRS licenses among a wide variety of applicants.

For these reasons, the Commission should safeguard the ability of new entrant and smaller and regional CMRS providers to offer reliable service that consumers want by requiring CMRS carriers to make available automatic roaming arrangements upon request, ensuring that rates charged by CMRS carriers for automatic roaming services are reasonable, and guarding against discrimination in the rates, terms, and conditions under which roaming arrangements are provided by CMRS carriers.

Respectfully submitted,

ALASKA NATIVE BROADBAND 1 LICENSE, LLC


By: Raymond J. Kaufman
President, ASRC Wireless Services, Inc., Manager of the
Manager of Alaska Native Broadband 1 License, LLC

